

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

In re)
)
TIMOTHY STINES,) CASE NO. 15-90383-BHL-13
)
Debtor(s).)

**MOTION TO MODIFY CHAPTER 13 PLAN
AND NOTICE OF OBJECTION DEADLINE**

The Debtor(s) hereby move(s) the Court, pursuant to 11 U.S.C. 1329, to modify the plan that was confirmed on August 14, 2015 as follows:

1. That Debtor needs to modify the Plan to treat a secured claim that came in after the confirmed plan was filed.
2. That Debtor proposes the Plan be modified to surrender Debtor's interest in the 2007 Suzuki LT-Z250 four wheeler that serves as collateral for the claim filed by Cavalry Spv 1, LLC (Proof of Claim #13) since Debtor no longer has the collateral.

NOTICE IS GIVEN that any objection must be filed with the Bankruptcy Clerk within 21 days from date of service [or such other time period as may be permitted by Fed.R. Bankr.P. 9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

New Albany
110 U.S. Courthouse
121 W. Spring St.
New Albany, IN 47150

The objecting party must ensure delivery of the objection to the party filing the motion, (the trustee – if not the movant or the objector) (and the debtor – if not the movant or the objector). If an objection is NOT timely filed, the requested relief may be granted.

WHEREFORE, Debtor(s) move(s) the Court to modify the plan as proposed and grant such other relief as appropriate.

/s/ Joseph A. Ross
Joseph A. Ross, Atty No. 20345-47
Attorney for Debtors
Joseph A. Ross
Attorney at Law
1503 West Arlington Road
Bloomington, Indiana 47404
Tel.: 812.339.3440
Fax: 812.323.7677
ECF Email: RossFiling@RossLawOffice.com

CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2015 a copy of the foregoing **MOTION TO MODIFY CHAPTER 13 PLAN AND NOTICE OF OBJECTION DEADLINE** was sent to the following party/parties through the Court's Electronic Case Filing System. Party/parties may access this filing through the Court's system.

U.S. Trustee Email: USTP.Region10@usdoj.gov
Joseph Black Email: jmbecf@trustee13.com

I further certify that on August 14, 2015, a copy of the **MOTION TO MODIFY CHAPTER 13 PLAN AND NOTICE OF OBJECTION DEADLINE** was mailed by first-class U.S. Mail, postage prepaid and properly addressed, to the person(s) below or on the list attached hereto.

Cavalry Spv 1, LLC
c/o Bass & Associates, P.C.
3936 E. Ft. Lowell Rd, Suite #200
Tucson, AZ 85712

Signed /s/ Joseph A. Ross
Joseph A. Ross
Attorney at Law
1503 West Arlington Road
Bloomington, Indiana 47404
Tel.: 812.339.3440
Fax: 812.323.7677
ECF Email: RossFiling@RossLawOffice.com